

# **EXHIBIT 254**

1           IN THE UNITED STATES DISTRICT COURT  
2           EASTERN DISTRICT OF TEXAS  
3           SHERMAN DIVISION  
4       THE STATE OF TEXAS, et al.                   PLAINTIFFS  
5       VS.                   CIVIL ACTION NO. 4:20-CV-957-SDJ  
6       GOOGLE LLC                                   DEFENDANT  
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9           30(b)(6) DEPOSITION OF STATE OF MISSISSIPPI

10           BY ITS REPRESENTATIVE

11           CRYSTAL UTLEY SECOY

12           \*\*\*\*\*

13           Taken at the  
14       Office of the Mississippi Attorney General,  
15           550 High Street,  
16           Jackson, Mississippi,  
17           on Thursday, April 25, 2024,  
18           beginning at approximately 12:56 p.m.  
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24           CATHY M. WHITE, CCR  
25           Certified Court Reporter #1309  
             Notary Public

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19 COUNSEL FOR THE WITNESS

20 ALSO PRESENT: Stephen Craig, Investigator (via Zoom)

21 Texas Attorney General's Office

22 VIDEOGRAPHER: JASON HOPKINS

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25

1 factual basis, then yes.

2 BY MR. AYCOCK:

3 Q. Okay. And Mississippi didn't conduct any  
4 separate investigation leading up to the filing of the  
5 complaint from what Texas conducted; right?

6 A. Correct.

7 Q. So before the lawsuit was filed, are you  
8 aware of Mississippi speaking to any in-state  
9 advertisers about harm that they've suffered based on  
10 the conduct that's been alleged in this case?

11 MS. SCHULTZ: Object to form.

12 A. We have not.

13 BY MR. AYCOCK:

14 Q. And are you aware of Mississippi or has  
15 Mississippi spoken -- start over.

16 Before the lawsuit was filed, did Mississippi  
17 speak with any in-state publishers about experiencing  
18 any harm due to the conduct that's been alleged by  
19 Google?

20 A. Does this go into our work product and  
21 details of the investigation?

22 Q. I'm simply asking whether a communication  
23 happened. So I don't think there's anything  
24 privileged about whether a communication happened.

25 A. I mean, I -- so I could probably help by

1 telling you that --

2 MS. SCHULTZ: I wouldn't -- only answer --

3 THE WITNESS: Okay.

4 MS. SCHULTZ: -- questions asked. To the  
5 extent you can do so without violating work product  
6 here, you may do so.

7 A. So, no.

8 BY MR. AYCOCK:

9 Q. Okay. So before suit was filed then,  
10 Mississippi determined that in-state advertisers and  
11 publishers had been harmed by Google's conduct?

12 MS. SCHULTZ: And I'm going to say that --  
13 assert a work product privilege there.

14 If you may -- if you can answer without  
15 disclosing work product, you may.

16 A. It's our position that advertisers and  
17 publishers in Mississippi would have been impacted by  
18 the conduct because it's our understanding that this  
19 is a national issue and that it impacts our entire  
20 state, consumers, advertisers, publishers, businesses.

21 BY MR. AYCOCK:

22 Q. Okay. So but you didn't make any specific  
23 findings about harm in particular to anybody in  
24 Mississippi before suit was filed; right?

25 MS. SCHULTZ: Same objection there to work

CERTIFICATE OF COURT REPORTER

I, Catherine M. White, CSR, and Notary Public  
in and for the County of Rankin, State of Mississippi,  
hereby certify that the foregoing pages, and including  
this page, contain a true and correct transcript of  
the testimony of the witness, as taken by me at the  
time and place heretofore stated, and later reduced to  
typewritten form by computer-aided transcription under  
my supervision and to the best of my skill and  
ability.

I further certify that I placed the witness  
under oath to truthfully answer the questions in this  
matter under the power vested in me by the State of  
Mississippi. I further certify that I am not in the  
employ of or related to any counsel or party in this  
matter, and have no interest, monetary or otherwise,  
in the final outcome of the proceedings.

Witness my signature and seal this the 26th  
day of April, 2024.

<%3807,Signature%>

CATHERINE M. WHITE, CSR No. 1309

My Commission Expires:  
February 1, 2026